

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANCESCA VIOLA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 1:21-CV-10426-LTS
JOSHUA BENTON and PRESIDENT AND)	
FELLOWS OF HARVARD COLLEGE)	
(HARVARD CORP.),)	
)	
Defendants.)	
)	

JOINT STIPULATED MOTION FOR PROTECTIVE ORDER

Discovery in this action has involved and is likely to involve production of confidential, proprietary, or private information for which special protection may be warranted. To expedite the flow of discovery materials, facilitate the prompt resolution of disputes over confidentiality, adequately protect material entitled to be kept confidential, and ensure that protection is afforded to material so entitled, the parties of this action, through their respective counsel, agree that a protective order is necessary.

The parties acknowledge that the proposed Stipulated Protective Order (attached hereto as **Exhibit 1**) is consistent with Civil Rule 26.

The parties agree that, except as specifically allowed by this Court's order, the Stipulated Protective Order shall otherwise remain in place.

Presented and Stipulated by:

FRANCESCA VIOLA

/s/ Dorrian H. Horsey

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JOSHUA BENTON

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***Admitted Pro hac vice**

**PRESIDENT AND FELLOWS OF
HARVARD COLLEGE**

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CERTIFICATE OF SERVICE

I, Dorrian H. Horsey, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/Dorrian H. Horsey

Dorrian H. Horsey